

REMARKS

Applicant respectfully requests reconsideration of this application in view of the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in substantially the same order in which the corresponding issues were raised in the Office Action.

Status of the Claims

Claims 1-3 and 5-23 are pending. Claims 1, 15, 18, and 21 are currently amended. Claims 5, 6, and 12 are canceled. No claims are added. No new matter has been added.

Summary of the Office Action

Claims 1-3, 5, 7-13 and 15-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,510,417 to Woods et al. (hereinafter "Woods") in view of U.S. Patent 5,774,525 to Kanevsky et al. (hereinafter "Kanevsky").

Claims 6 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of U.S. Patent No. 5,970,446 to Goldberg et al. (hereinafter "Goldberg").

CLAIMS 1-3, 7-11, and 13-23

Claim 1 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Woods in view of Kanevsky. Applicant respectfully submits that claim 1 is patentable over the cited reference because the combination of Woods and Kanevsky does not disclose all of the limitations of the claim. Claim 1 recites:

A system comprising:

 a module to identify a user;

 a voice user interface to facilitate communications between the user and the system;

 a **module to generate a grammar file** to enhance the ability of the system to comprehend communications between the user and the system;

 a database to store contextual information pertaining to the user;

and

 the system to use user-specific contextual information to dynamically change the voice user interface, wherein the voice user interface **alters security characteristics** for navigational options through

the voice user interface that are presented to the user **based upon environmental information at the location of the user**, wherein the environmental information comprises information selected from the group consisting of details of a communication device, details of a communication channel, audio scene information, or a combination thereof.

(Emphasis added).

Applicant respectfully disagrees with the Office Action's characterization of the prior art because Woods and Kanvesky, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest altering security characteristics based upon environmental information at the location of the user. Additionally, the combination of cited references do not teach a module to create a grammar file, as recited in the claim.

Woods Does Not Teach Altering Security Characteristics.

The Office Action acknowledges that Woods does not teach altering security characteristics. In particular, the Office Action states, “Woods does not explicitly teaches, ‘altering the security characteristics presented to the user by the voice user interface based upon the environment information at the location of the user’.” Office Action, May 31, 2006, p. 3 (sic all) (emphasis added).

Woods Does Not Teach Environmental Information.

The Office Action states that “Woods teaches . . . ‘the system to use user-specific contextual information to dynamically change the voice user interface, wherein the voice user interface alters navigational options through the voice user interface that are presented to the user based upon environmental information at the location of the user’ (col. 24, line 30 to col. 25, line 65).” Office Action, May 31, 2006, p. 3 (sic all) (emphasis added). However, Woods does not teach environmental information because entering a zip code or providing a verbal response to prompts is not environmental information.

The cited reference describes how the voice portal 10 uses automatic speech recognition (ASR) techniques to acquire a user's response. One example illustrates how the voice portal 10 may ask the user to say his or her ZIP code. The voice portal 10 then

analyzes the voice response from the user (e.g., the user says the numbers of his or her ZIP code) to determine which numbers the user said.

However, the ZIP code is not environmental information, as recited in the claim. Here, some description from the specification is helpful to understand what is meant by the term “environmental information.” Although details of the specification should not be read into the claim limitations, the specification provides a written description which may be useful in understanding the claimed invention. The specification of the present application discusses an embodiment of environmental information as “information such as details of the user’s chosen communication device, 202, details of the communication channel, or audio scene information.” Detailed Description, p. 7, lines 7-8. Further discussion of the communication channel characteristics are provided in the present application at page 9, lines 4-19. Further discussion of the audio scene information is provided at page 9, line 20, to page 10, line 10.

In contrast, the ZIP code is a voice response from a user that merely indicates a geographic location. A ZIP code does not qualify as environmental information within the context of the claim or specification because the voice entry of the ZIP code and the ZIP code itself do not relate to the user’s chosen communication device, the communication channel, the audio scene information, or similar information. Therefore, the reference to a ZIP code does not disclose environmental information. The other references cited in Woods are similar to a ZIP code and, for similar reasons, are not environmental information.

Woods Does Not Teach Altering Security Characteristics for Navigational Options Based On Environmental Information At The Location Of The User.

Even if the ZIP code or, as another example, the call from a landline or cell phone were environmental information, Woods fails to disclose dynamically changing the voice user interface system based on the ZIP code or call from a landline or cell phone. At most, Woods merely teaches storing some information for subsequent marketing and advertising purposes, as well as generally improving both performance and service. Woods, col. 13, lines 22-25. However, Woods is silent as to how such information might be applied for marketing purposes or performance enhancements. Moreover, Woods is

completely silent as to potentially using such information to make dynamic changes to the voice portal 10 or any other part of the voice interface system. Therefore, Woods does not disclose dynamically changing the voice interface system based on environmental information.

Kanevsky Does Not Teach Altering Security Characteristics Based Upon Environmental Information At The Location Of The User.

The Office Action states that “Kanevsky teaches . . . ‘altering the security characteristics presented to the user by the voice user interface based upon the environment information at the location of the user’ (col. 6, lines 48-59 and col. 9, lines 8-25).” Office Action, May 31, 2006, p. 3 (sic all) (emphasis added). However, Kanevsky does not disclose using environmental information to change the VUI. Rather, Kanevsky merely discloses the use of security measures to prevent access to a user account by eavesdroppers. Although Kanevsky appears to disclose controlling the level of security of an identification process, such controlling does not occur based on environmental information at the location of the user.

In particular, Kanevsky teaches that one technique to control the level of security is to increase security in response to result data. Kanevsky, col. 9, lines 10-18. Result data, as defined by Kanvesky, is data from an authentication system that assigns a confidence level to a user access request. Kanevsky, col. 8, lines 55-62. Thus, if the result data represents a high confidence level, then the security level may be decreased. On the other hand, if the result data represents a low confidence level, then the security level may be increased. In this way, the system controller controls the level of security.

However, the result data is not environmental information, as recited in the claim. In particular, the result data does not qualify as environmental information within the context of the claim or specification because the result data does not relate to the user’s chosen communication device, the communication channel, the audio scene information, or similar information. Furthermore, even if the result data were environmental information, the result data is not environmental information at the location of the user. The result data is totally unrelated to the location of the user because Kanevsky fails to

disclose any such relationship. Thus, Kanevsky does not teach or suggest altering security characteristics based on environmental information at the location of the user.

Claim 1 Is Patentable Over The Combination Of Woods And Kanevsky Because The Combination of Woods and Kanevsky Does Not Teach Altering Security Characteristics Based Upon Environmental Information At The Location Of The User.

The Office Action states that “[i]t would have been obvious to one of ordinary skill in the art at the time of the invention to use Kanevsky’s teaching of altering security characteristics presented to the user based up on the environmental information at the location, in the invention of Woods because Kanevsky teaches to protect against eavesdroppers gain access to the service or facility (col. 2, lines 24-26).” Office Action, May 31, 2006, p. 3 (sic all) (emphasis added).

Whether or not Kanevsky might teach altering security characteristics is inapposite in this case because neither Woods nor Kanevsky teaches altering anything based on environmental information at the location of the user, as explained above. Given that Woods and Kanevsky do not teach altering an interface based on environmental information at the location of the user, the combination of Woods and Kanvesky does not teach or suggest altering security characteristics based on environmental information at the location of the user.

In contrast, claim 1 recites a voice user interface which “alters security characteristics for navigational options through the voice user interface that are presented to the user based upon environmental information at the location of the user.” For the reasons stated above, Woods and Kanevsky, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest altering security characteristics based upon environmental information at the location of the user. Given that the cited references fail to teach or suggest all of the limitations of the claim, Applicant respectfully submits that claim 1 is patentable over the cited references. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

Each of independent claims 15, 18, and 21 also recites altering security characteristics based on environmental information at the location of the user, although

the scope of each of these claims is not necessarily the same as any of the other independent claims. Therefore, since the combination of Woods and Kanevsky does not teach or suggest altering security characteristics based on environmental information at the location of the user, claims 15, 18, and 21 are also patentable over the cited references. Also, each of claims 15, 18, and 21 may be patentable over the cited references for one or more additional reasons.

Given that claims 2-3, 5-14, 16-17, 19-20, and 22-23 depend from independent claims 1, 15, 18, and 21, which are patentable over the cited references, Applicant respectfully submits that dependent claims 2-3, 5-14, 16-17, 19-20, and 22-23 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 2-3, 5-14, 16-17, 19-20, and 22-23 under 35 U.S.C. § 103(a) be withdrawn.

Claim 1 Is Patentable Over The Combination Of Woods And Kanevsky Because The Combination of Woods and Kanevsky Does Not Teach A Module To Create A Grammar File.

The Office Action states that “Woods teaches, ‘a module to generate a grammar file to enhance the ability of the system to comprehend communications between the user and the system’ (col. 9, lines 38-52).” Office Action, May 31, 2006, p. 3 (sic all) (emphasis added).

However, the cited lines in Woods merely describe the customer management subsystem 130, which tracks the use of services. For example, the customer management subsystem may identify problem areas or track user timing. There is no disclosure by Woods of a grammar file or generating a grammar file.

In contrast, claim 1 recites a voice user interface which “a module to generate a grammar file.” For the reasons stated above, Woods and Kanevsky, either alone or in combination, fail to teach or suggest all of the limitations of the claim. In particular, the cited references do not teach or suggest a module to generate a grammar file. Given that the cited references fail to teach or suggest all of the limitations of the claim, Applicant respectfully submits that claim 1 is patentable over the cited references. Accordingly, Applicant requests that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

Each of independent claims 15, 18, and 21 also recites a limitation related to generating a grammar file, although the scope of each of these claims is not necessarily the same as any of the other independent claims. Therefore, since the combination of Woods and Kanevsky does not teach or suggest altering security characteristics based on environmental information at the location of the user, claims 15, 18, and 21 are also patentable over the cited references. Also, each of claims 15, 18, and 21 may be patentable over the cited references for one or more additional reasons.

Given that claims 2-3, 5-14, 16-17, 19-20, and 22-23 depend from independent claims 1, 15, 18, and 21, which are patentable over the cited references, Applicant respectfully submits that dependent claims 2-3, 5-14, 16-17, 19-20, and 22-23 are also patentable over the cited references. Accordingly, Applicant requests that the rejection of claims 2-3, 5-14, 16-17, 19-20, and 22-23 under 35 U.S.C. § 103(a) be withdrawn.

CONCLUSION

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections have been overcome. If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Jeffrey Holman at (408) 720-8300.

If there are any additional charges, please charge them to Deposit Account No. 02-2666.

Respectfully submitted,
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